



United States
Department of
Agriculture

Forest
Service

Fishlake National Forest
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File Code: 2820-4

Date: December 3, 2007

Ms. Selma Sierra
Utah State Director
Bureau of Land Management
P. O. Box 45155
Salt Lake City, UT 84111

*Incoming
C/OA/0002
SWCO*

Dear Ms. Sierra:

In reference to: 3432, SL-062583, UTU-47080, and UT-923, Ark Land Company, for Canyon Fuel Company submitted an application for the modification of two existing coal leases (SL-062583 and UTU-47080) to the Bureau of Land Management (BLM) dated July 5, 2007. This copy was received by the Fishlake National Forest on November 1, 2007.

The Forest Service has reviewed these two coal lease modifications regarding Forest Plan consistency and data adequacy standards as discussed below:

Forest Plan Consistency

The two coal leases lie within 4B and 6B Management Areas evaluated in the Fishlake National Forest Land and Resource Management Plan, 1986 (Forest Plan). Issues and concerns that occur within 4B and 6B involve habitat needs of one or more management indicator species and grazing management.

It is concluded that these two coal lease modifications as defined in the application are consistent with the Forest Plan direction and therefore, are both available for further consideration for coal leasing in an environmental analysis. The analysis will evaluate the issues identified in the Forest Plan in addition to those identified through the scoping process.

Forest Plan Emphasis and Direction

The area of these coal lease modifications lie within areas 75 and 82 (Forest Plan, Appendix O, p. O-8). These are designated as class IV and classes I-IV, respectively, indicating favorable potential for coal reserves.

From the Forest's Plan Management Area Map:

Coal lease SL-062583 involves Management Area 6B: Intensive grazing management systems are favored over extensive systems, including but not limited to recreation, silviculture, wildlife and visual resources. Conflicts between livestock and wildlife are resolved in favor of livestock.



Coal lease UTU-47080 involves Management Area 6B as defined above as well as Management Area 4B: Management emphasis is on the habitat needs of one or more management indicator species. The goal is to optimize habitat capability, and thus numbers of the species. Investments in other compatible resource uses may occur but will be secondary to habitat requirements.

In general, coal leasing would be compatible with these two Management Area objectives, primarily due to the fact that these coal leases use underground coal mining methods and don't significantly disturb the surface resources that these two Management Areas are concerned with.

Data Adequacy Standards

The Fishlake National Forest review for data adequacy was limited to the application information as forwarded by the BLM in their notification correspondence. Presently there is insufficient resource data (including coal data) to complete the environmental analysis but adequate enough to begin the scoping process.

Coal Suitability

These two coal lease modifications lie within the Wasatch Plateau Known Recoverable Coal Resource Area (KRCRA). The Forest Service is bound to comply with the Federal Coal Leasing Amendments Act of 1977 (FCLAA), as well as its 1978 supplements, and the Surface Mining Control and Reclamation Act of 1977 (SMCRA). The FCLAA directs that, "no lease sale shall be held unless the lands containing the coal deposits have been included in a comprehensive land-use plan and such sale is compatible with such plan." The lands described in these two coal lease modification applications are included and compatible with the current Forest Plan.

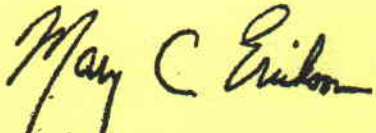
SMCRA requires an unsuitability review for certain types of coal mining. Since these two areas proposed for coal lease modification lie adjacent to existing coal leases, this area has already been previously determined as acceptable for coal leasing. Coal lease SL-062583 has an effective lease date of September 12, 1941, and coal lease UTU-47080 has an effective lease date of January 1, 1981.

Conclusion

Existing coal leases SL-062583 and UTU-47080 are available for further consideration for coal lease modifications under the current Forest Plan, subject to further environmental analysis. There is at present insufficient resource data to complete the environmental analysis and additional detailed coal data will be needed to meet the requirements of the Uinta-Southwestern Utah Coal Region Data Adequacy Standards. Given the current Fishlake National Forest NEPA workload and the fact that these two coal lease modifications involve minimum surface disturbance, the Forest Service hereby requests that the BLM be designated as the lead agency with the Fishlake National Forest as a cooperating agency on this environmental analysis.

If you have any questions or require additional information, contact Robert Ernst at the Forest Supervisor's Office in Richfield, Utah.

Sincerely,



MARY C. ERICKSON
Forest Supervisor

MCE/re

cc: Fred Houston, Rob Ernst, Diane Freeman
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Pamela Grubaugh-Littig, Coal Regulatory Program, Utah Div. of Oil, Gas and Mining,
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